

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Dragon, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 ldragon@wrightlegal.net

11 *Attorneys for Plaintiff, U.S. Bank National Association, as Trustee, Successor in Interest to Bank*
12 *of America, National Association as Successor by Merger to LaSalle Bank National Association,*
13 *as Trustee for Certificateholders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed*
14 *Certificates, Series 2005-HE6*

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 U.S. BANK NATIONAL ASSOCIATION,
18 AS TRUSTEE, SUCCESSOR IN INTEREST
19 TO BANK OF AMERICA, NATIONAL
20 ASSOCIATION AS SUCCESSOR BY
21 MERGER TO LASALLE BANK
22 NATIONAL ASSOCIATION AS TRUSTEE
23 FOR CERTIFICATEHOLDERS OF BEAR
24 STEARNS ASSET BACKED SECURITIES I
25 LLC, ASSET-BACKED CERTIFICATES,
26 SERIES 2005-HE6,

27 Plaintiff,

28 vs.

FIDELITY NATIONAL TITLE GROUP,
INC.; FIDELITY NATIONAL TITLE
INSURANCE COMPANY; DOE
INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:20-cv-01955-KJD-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
MOTION TO DISMISS [ECF No. 45]**

(Second Request)

Plaintiff, U.S. Bank National Association, as Trustee, Successor in Interest to Bank of
America, National Association as Successor by Merger to LaSalle Bank National Association, as
Trustee for Certificateholders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed
Certificates, Series 2005-HE6 ("U.S. Bank") and Defendant Fidelity National Title Insurance

1 Company ("Fidelity"), by and through their counsel of record, hereby stipulate and agree as
2 follows:

- 3 1. On May 22, 2023, Fidelity filed a Motion to Dismiss [ECF No. 45];
- 4 2. U.S. Bank's deadline to respond to Fidelity's Motion to Dismiss is currently June 12, 2023
5 [ECF No. 52];
- 6 3. U.S. Bank's counsel is requesting a three (3) week extension until Monday, July 3, 2023,
7 to file its response to the pending Motion to Dismiss;
- 8 4. This extension is requested to allow counsel for U.S. Bank additional time to review and
9 respond to the points and authorities cited to in the pending Motions due to an unforeseen
10 medical emergency;
- 11 5. Counsel for Fidelity does not oppose the requested extension;
- 12 6. This is the second request for an extension which is made in good faith and not for
13 purposes of delay.

14 **IT IS SO STIPULATED.**

15 DATED this 12th day of June, 2023.

DATED this 12th day of June, 2023.

16 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

17 /s/ Lindsay D. Dragon

/s/ Kevin Sinclair

18 Lindsay D. Dragon, Esq.

Kevin Sinclair, Esq.

19 Nevada Bar No. 13474

Nevada Bar No. 12277

20 7785 W. Sahara Ave., Suite 200

16501 Venture Boulevard, Suite 400

21 Las Vegas, NV 89117

Encino, California 91436

22 *Attorneys for Plaintiff*

Attorneys for Defendants

23 **IT IS SO ORDERED.**

24 Dated: 6/13/2023

25 
26 UNITED STATES DISTRICT COURT JUDGE